

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**
Greenbelt Division

IN RE:

Case No.: 18-13079-LSS

TOMAS E. CARBAJAL

Chapter: 13

Debtor

OBJECTION TO CONFIRMATION OF DEBTOR'S PROPOSED CHAPTER 13 PLAN

COMES NOW, Seterus, Inc. as the authorized subservicer for Federal National Mortgage Association ("Fannie Mae"), creditor c/o Seterus, Inc. ("Creditor"), by and through counsel, and files its Objection to Confirmation of Debtor's Proposed Chapter 13 Plan, and as reasons therefor respectfully represents as follows:

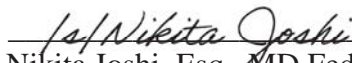
1. Creditor is a mortgage lender/servicer.
2. On or about March 9, 2018, Tomas E. Carbajal ("Debtor") filed a Voluntary Petition in this Court under Chapter 13 of the United States Bankruptcy Code.
3. Nancy Spencer Grigsby is the Chapter 13 Trustee of the Debtor's bankruptcy estate.
4. Creditor holds a Deed of Trust solely secured by the Debtor's property located in Montgomery County, Maryland, and improved by a residence known as 11432 Stoney Point Place, Germantown, MD 20876 (the "Property").
5. On or about April 5, 2018, Debtor filed a Chapter 13 Plan (the "Plan"). The Chapter 13 Plan provides for a short sale of the above referenced property with no alternative treatment if the short sale is not completed nor does the Plan provides a deadline to sell the property.
6. Objections to the Plan are due by June 11, 2018.
7. The deadline to file a proof of claim is May 18, 2018.
8. Creditor has not yet filed its proof of claim but anticipates filing a proof of claim that will include prepetition arrears of approximately \$25,477.03.
9. Debtor's Plan is underfunded and is therefore not confirmable.
10. Creditor does not oppose denial of the Plan with leave to amend or continuance, as proper for disposition and processing of this matter.

WHEREFORE, the Creditor its successors and/or assigns prays that this Court:

1. Enter an order DENYING confirmation of the Debtor's Chapter 13 Plan; and
2. Grant such other and further relief as necessary.

Respectfully Submitted,

Dated: May 14, 2018


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Attorney for the Creditor

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 2018, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Objection to Confirmation of Debtor's Proposed Chapter 13 Plan will be served electronically by the Court's CM/ECF system on the following:

Nancy Spencer Grigsby, Trustee

Douglas N Gottron, Esq.

I hereby further certify that on this 14th day of May, 2018, a copy of the Objection to Confirmation of Debtor's Proposed Chapter 13 Plan was also mailed first class mail, postage prepaid, to:

Tomas E. Carbajal
135 West Wing Way
Boonsboro, MD 21713


Nikita Joshi, Esq.